

## UNITED STATES DISTRICT COURT

for the  
Western District of TexasFiled 1-28-14  
Clerk, U. S. District Court  
Western District of Texas  
By KLV Deputy

United States of America )

v. )

DAVID ANDERSON (1) ) Case No. SA: 14-M-0094 (1-3)

DALE CHIVERS (2) )

ASHLEA PERKINS (3) )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 27, 2014 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

## Code Section

21 U.S.C. 846, 841(a)(1) & 841(b)  
(1)(A)

## Offense Description

Conspiracy to Possess with Intent to Distribute 50 grams or more of  
Methamphetamine (actual).PENALTIES: 10 years to life imprisonment, \$10 million fine, 5 years  
supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.  
Complainant's signature

BRIAN WHITE, SAPD DETECTIVE

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/28/2014  
Judge's signatureCity and state: San Antonio, Texas

PAMELA A. MATHY, US MAGISTRATE JUDGE

Printed name and title

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Detective Brian White, being duly sworn do hereby depose and state:

Your affiant is currently employed as a detective with the San Antonio Police Department (SAPD) assigned to the Gang Unit as an investigator. Your affiant has been employed as a peace officer since 1994. During my career I have conducted and participated in hundreds of investigations concerning persons in violation of state and federal narcotics and firearms laws, specifically the trafficking of both firearms and commercial quantities of narcotics.

This affidavit is in support of a criminal complaint against **David Anderson, Dale Chivers** and **Ashlea Perkins**. Your Affiant believes that probable cause exists that **David Anderson, Dale Chivers** and **Ashlea Perkins** violated Title 21 United States Code Section 846, Conspiracy to Possess with Intent to Distribute 50 grams or more of Methamphetamine (actual). The following is in support thereof.

On January 26, 2014, your Affiant secured a state narcotics search warrant for **David Anderson's** residence, a five-bedroom house, located at 6218 Donely Place, San Antonio, Texas, in the Western District of Texas. **Dale Chivers** and **Ashlea Perkins** also live at this residence. On January 27, 2014, in advance of the execution of the search warrant, surveillance was established on 6218 Donely Place. No one was home at the time. Officers were able to locate **Anderson, Chivers, Perkins** and two unknown females enter a tan Cadillac bearing dealer plate 03D6422 at a local restaurant in San Antonio, Texas. Officers observed the Cadillac travel to the Main Event parking lot where at some point, four of the individuals exited the Cadillac, before the Cadillac left the location with only **Chivers** in the Cadillac. Moving surveillance was maintained as the Cadillac, operated by **Chivers**, drove to 6218 Donely Place. **Chivers** parked the vehicle and entered the residence at 6218 Donely Place. A short time later, another vehicle arrived carrying **Anderson** and **Perkins** who also entered the residence. Shortly after entering the residence, **Perkins** and **Chivers** exited the residence and entered an Infinity G35 bearing dealer plate 10C3446, and **Anderson** entered the Cadillac. Both vehicles left the residence. Moving surveillance was maintained on the Cadillac as it returned to the Main Event parking lot followed by the Infinity. Surveillance observed **Chivers** exit the Infinity and enter the Cadillac with **Anderson**. While **Anderson** and **Chivers** were sitting in the parking lot, surveillance observed several individuals come up to and enter the Cadillac where they stayed for a very short period of time. After the transactions, surveillance observed **Chivers** get back into the Infinity and leave the Main Event Parking lot, **Anderson** exited the Cadillac and went back into the Main Event. Moving surveillance was maintained as **Chivers** traveled back to the residence at 6218 Donely Place.

At this time, due to the observations of surveillance, officers decided to execute the search warrant. At approximately 2200 hours the state narcotics search warrant was executed at 6218 Donely Place. Once inside, three males were located inside the residence. **Chivers** and another male were standing around the kitchen table where there was approximately \$300.00 in US Currency and several bags of marijuana with an aggregate weight of 65 grams laying on the table. Both of these individuals were taken into custody. A third male was discovered hiding in a restroom located near the kitchen. When taken into custody, **Chivers** was in possession of approximately 1.5 grams of methamphetamine.

Surveillance was maintained on **Anderson**, **Perkins**, and the other two females, who stayed at the Main Event. **Anderson**, **Perkins**, and the two females were detained by both plain clothes and uniformed officers at the Main Event. Investigators observed **Perkins** attempt to hide her purse which was later discovered to contain approximately 5.7 grams of methamphetamine and \$480.00 in US Currency. All were transported back to 6218 Donely Place where all involved, including **Anderson**, **Chivers**, and **Perkins**, were read the search warrant and their constitutional rights. All stated that they understood their Miranda rights. After being read their constitutional rights, all were asked if they had any narcotics in their possession. The two other females admitted to possessing methamphetamine on their person.

**Anderson** was escorted upstairs where your Affiant conducted an interview. **Anderson** was advised of the narcotics investigation and asked where the narcotics in the residence were located. **Anderson** stated that all of the narcotics he had were located in the safe in the downstairs living room. **Anderson** provided the combination to the safe where approximately 901 grams of methamphetamine and 39 grams of unknown pills were discovered. This evidence was packaged in many different packages which is the manner in which narcotics are commonly packaged for distribution. **Anderson** was asked if he had any US Currency stashed at the residence. **Anderson** responded that all of his cash was in **Perkin's** purse (\$480.00) and in the Cadillac he was in earlier in the night. Officers discovered approximately \$13,802.00 in US Currency in the Cadillac.

A search of **Chivers'** room at the residence revealed approximately 54.57 grams of methamphetamine in three separate locations. Officers also recovered two firearms: a loaded Walther, model PPK, .380 caliber semi-automatic pistol, serial number 4694BAH, with two magazines, and a loaded Taurus, model TCP, .380 semi-automatic pistol, and a box of ammunition. Also discovered in this room were ledgers and a digital scale. Approximately 46 grams of the methamphetamine recovered was on top of a futon, and the loaded Taurus model TCP, .380 semi-automatic pistol, was located under the futon cushion. The loaded Walther, model PPK, .380 caliber semi-automatic pistol, serial number 4694BAH, was recovered from the TV stand.

A search of **Perkin's** room, which was attached to **Anderson's** room, revealed 9.45 grams of methamphetamine packaged in 13 separate Ziploc baggie's, 3.95 grams of marijuana, 27 pills of Adderall and 3 unknown pills all discovered in a small safe, which was unlocked, located in **Perkins'** room on a shelf. Also discovered on a shelf near the safe was a Hello Kitty notebook which appeared to be a ledger.

Once our search was completed, all involved were transported to the SAPD Gang Office where video recorded interviews were conducted.

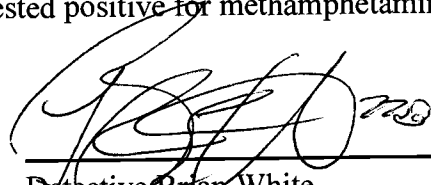
**Anderson** stated that he receives approximately two pounds of methamphetamine to distribute every three or four days. He further stated that he does not have a driver's license and uses both **Chivers** and **Perkins** to assist him with picking up money and dropping off narcotics. **Anderson** admits that the earlier activities observed by officers in the Main Event parking lot were narcotics transactions. **Anderson** has the following prior felony convictions: Possession of a Controlled Substance PG1 1-4 grams, Possession with Intent to Deliver a Controlled Substance PG1 4-200 grams, and Possession of a Controlled Substance 1-4 grams (methamphetamine). **Anderson** was released from TDC-ID on 3/7/2013.

**Chivers** confirmed that he does assist **Anderson** with deliveries of narcotics and the collection of money in exchange for a place to live and spending money. **Chivers** stated that he has been doing this for the past five months. **Chivers** admits that the earlier activities observed by officers in the Main Event parking lot was narcotics transactions. **Chivers** has the following prior felony convictions: Possession with Intent to Deliver a Controlled Substance (Methamphetamine), Possession of a Short Barrel Firearm, and Burglary W/I Theft/Force. **Chivers** is currently on bond for Possession with Intent to Deliver a Controlled Substance PG1 4-200 grams, and Possession of a Controlled Substance, less than 1 gram.

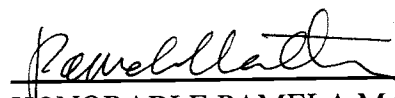
**Perkins** is **Anderson's** girlfriend. **Perkins** denies assisting **Anderson** on a regular basis, but she did admit to occasionally driving **Anderson** around to distribute narcotics and to pick up money. Officers conducting surveillance have previously observed **Perkins** make a delivery of narcotics.

All involved confirmed that **Anderson** is distributing large quantities of methamphetamine on a regular basis in the San Antonio area.

All narcotics seized were field tested and tested positive for methamphetamine.

  
\_\_\_\_\_  
Detective Brian White  
SAPD Gang Unit Detective

Sworn to before me and subscribed in my presence on January 28, 2014, at San Antonio, Texas.

  
\_\_\_\_\_  
HONORABLE PAMELA MATHY  
United States Magistrate Judge  
Western District of Texas